

THE HONORABLE RICHARD A. JONES

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON**

ABRAHAM LEAVITT,

Plaintiff,

vs.

CENTRAL CREDIT LLC,

Defendant.

Case No. 2:23-cv-01817-RAJ

**Unopposed Motion One-Week Extension of
Time to Respond to the Motion to Dismiss
and to File First-Amended Complaint; Re-
Noting Motion**

NOTING DATE: June 17, 2024 (same day)

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and pursuant to Civil Local Rule 7(j), Plaintiff Abraham Leavitt (“Plaintiff”) hereby moves, unopposed, for a one-week extension of time and relief from the deadline to respond to the motion to dismiss and to file a first-amended complaint, permitting Plaintiff up to and including **Monday, June 24, 2024**, to file a response to the motion to dismiss and to file a first-amended. Good cause shown is that Plaintiff’s lead trial counsel has been sick and another of Plaintiff’s counsel has been dealing with a personal matter.

The motion to dismiss should be re-noted to **Monday, July 8, 2024**, to permit Defendant’s counsel ample time to reply. Plaintiff’s counsel has conferred with opposing counsel and understands that this Motion is **unopposed**.¹ Plaintiff’s counsel appreciates the professional courtesy and is happy to reciprocate should opposing counsel need more time on future filings.

¹ Please see true and correct copies of attached email correspondence.

1 Date: June 18, 2024

Respectfully submitted,

2 **DIGITAL JUSTICE FOUNDATION**
3 A NONPROFIT, PUBLIC-INTEREST LAW FIRM

4 By /s/ Andrew Grimm
5 Andrew Grimm (WSBA No. 51486)
6 DIGITAL JUSTICE FOUNDATION
7 15287 Pepperwood Drive
8 Omaha, Nebraska 68154
9 (531) 210-2381
10 Andrew@DigitalJusticeFoundation.org

Attorney for Plaintiff

11 **CERTIFICATE OF COMPLIANCE**

12 I hereby certify that this filing contains **290** words.

13 Dated: June 18, 2024

Respectfully submitted,

14 /s/ Andrew Grimm
15 Andrew Grimm

16 **CERTIFICATE OF SERVICE**

17 I hereby certify that I served the foregoing via CM/ECF.

18
19 Dated: June 18, 2024

Respectfully submitted,

20 /s/ Andrew Grimm
21 Andrew Grimm
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